

# EXHIBIT 115

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

STATES OF NEW YORK,  
MASSACHUSETTS,  
WASHINGTON, COLORADO,  
CONNECTICUT, DELAWARE,  
DISTRICT OF COLUMBIA,  
HAWAII, ILLINOIS, IOWA, NEW  
MEXICO, NORTH CAROLINA,  
OREGON, PENNSYLVANIA,  
RHODE ISLAND, VERMONT, and  
VIRGINIA,

Plaintiffs,

v.

DONALD TRUMP, in his official  
capacity as President of the United  
States; U.S. DEPARTMENT OF  
HOMELAND SECURITY; ELAINE  
C. DUKE, in her official capacity; U.S.  
CITIZENSHIP AND IMMIGRATION  
SERVICES; U.S. IMMIGRATION  
AND CUSTOMS ENFORCEMENT;  
and the UNITED STATES OF  
AMERICA,

Defendants.

CIVIL ACTION NO. 1:17-cv-05228  
(NGG) (JO)

I, Ryan Tack-Hooper, hereby declare as follows:

1. I am a Staff Attorney & Legislative Advocate for American Civil Liberties Union of Delaware ("ACLU").
2. The ACLU of Delaware is a nonpartisan, nonprofit organization dedicated to the defense of civil liberties for all people in the United States. We work in the courts, in the state and federal legislatures, and at the grassroots level to defend the Constitution wherever it is threatened. In many areas of our work in Delaware, we are the sole nonprofit legal provider.
3. The ACLU of Delaware has 2 attorneys and 6 total full-time staff members. While we do not represent individuals in immigration proceedings, we do regularly offer immigration-related know-your-rights workshops, individualized referrals to qualified and competent immigration counsel, advice to Delaware institutions impacted by changes to immigration law on the likely effects of changes to immigration law, and legal matters collateral to immigration enforcement, such as detention that violates the Fourth Amendment or that is based on improper profiling.
4. Currently, the ACLU of Delaware's immigration-related work includes on-going counseling of clients and organizations on the effects of President Trump's executive orders and referring them, as appropriate, to qualified and competent counsel for specific issues.
5. Upon information and belief, there are only a few attorneys who are licensed to practice in the State of Delaware that provide the kind of services that are needed by people who are unable to renew their immigration status. The demand for immigration-related legal services is greater than the supply of competent lawyers, necessitating that legal organizations like the ACLU play a critical role in assessing and referring cases to counsel.
6. The rescission of the Deferred Action for Childhood Arrivals ("DACA") will have a significant impact on the ACLU of Delaware's limited resources. With the announcement of the phase-out of the program, we have received a substantial increase in immigration-related legal intake. If the Administration's DACA plans are fully implemented, it will likely exponentially increase the amount of immigration law services needed in Delaware.
7. The ACLU of Delaware is concerned that, due to its limited resources, an immediate effect of the likely high volume of DACA-related cases will be that the ACLU of Delaware may have to decline representation of other important civil rights cases.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed this 25th day of September, 2017.



Ryan Tack-Hooper  
Staff Attorney & Legislative Advocate  
American Civil Liberties Union of Delaware